

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION

In Re: CECILIA ANN SCARBOROUGH THOMAS, ) Case #12-11126 C-13G  
 )  
Debtor )  
\_\_\_\_\_ )

**OBJECTION TO CLAIM #3 OF  
MARY VUNCANNON**

NOW COMES the Debtor, by and through counsel, and objects to Claim number 3 filed by Mary Vuncannon in the amount of \$84,056.67. The basis of the debtor's objection to the claim is that the debtor disputes that there is any debt obligation owing to the claimant. The debtor further submits that the claim attaches an unsigned promissory note, and the recorded deed of trust does not bear the true and actual signature of the debtor or her non-filing spouse.

WHEREFORE, the debtor respectfully requests the Court enter an order disallowing claim #3 filed by Mary Vuncannon in the amount of \$84,056.67 and for such other and further relief as the Court deems fit and proper.

This the 3rd day of January, 2015.

by: /s/ Phillip E. Bolton  
Phillip E. Bolton SB #12326  
Attorney for Debtor  
622-C Guilford College Rd.  
Greensboro, NC 27409  
(336) 294-7777

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he served the foregoing objection to claim #3 upon the parties listed below by causing said document(s) to be deposited in a post-paid, properly addressed wrapper in a post office or official depository under the exclusive care and custody of the United States Postal Service and/or by electronic means as allowed by the Court.

This the 3rd day of January, 2015.

by: /s/ Phillip E. Bolton  
Phillip E. Bolton  
Attorney for Debtor  
NC Bar#12326  
Bolton Law Group, PA  
622-C Guilford College Rd.  
Greensboro, NC 27409

ELECTRONICALLY SERVED ON:  
William P. Miller  
United States Bankruptcy Administrator  
PO Box 1828  
Greensboro, NC 27402

Anita Jo Kinlaw Troxler  
Chapter 13 Trustee  
PO Box 1720  
Greensboro, NC 27402

SERVED BY US POSTAL SERVICE ON:  
J. Brooks Reitzel  
PO Box 5544  
High Point, NC 27262

Mary Vuncannon  
301 Westover Drive  
High Point, NC 27265